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Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

CAROLINE BARKER,

Plaintiff,

v.

MARVIN E. KAPLAN, Chairman, National
 Labor Relations Board,

Defendant.

) CASE NO. 4:23-cv-308-DMR

) **STIPULATION TO CONTINUE THE INITIAL**
) **CASE MANAGEMENT CONFERENCE AND**
) **ASSOCIATED DEADLINES AND ORDER (AS**
) **MODIFIED)**

) The Honorable Donna M. Ryu

On May 2, 2025, the Court continued the initial case management conference to August 20, 2025, at 1:30 p.m. *See* Dkt. No. 97. On July 11, 2025, Defendant filed his answer to Plaintiff's complaint, and a counterclaim against Plaintiff. Dkt. No. 101. On August 1, 2025, Plaintiff filed her answer to Defendant's counterclaim. Dkt. No. 102.

Pursuant to Civil Local Rule 6-2, the parties to this action hereby stipulate and respectfully request that the Court continue the case management conference and all associated deadlines by thirty days, until September 17, 2025. The parties make this request because this matter will be reassigned to a new Assistant United States Attorney as counsel for Defendant, and counsel will need time to review the case and confer with Plaintiff. The parties apologize to the Court for making this request in less than the fourteen days before the scheduled conference date, due to their need to confer regarding the

continuanance request. For these reasons, and as articulated below in the Declaration of Counsel, the parties respectfully request that the Court grant their stipulation.

DATED: August 12, 2025

Respectfully submitted,¹

CRAIG H. MISSAKIAN
United States Attorney

s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney

Attorneys for Defendant

DATED: August 12, 2025

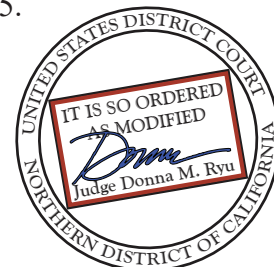
s/ Caroline Barker
CAROLINE BARKER
Plaintiff, *pro se*

ORDER (AS MODIFIED)

Pursuant to stipulation, the court grants the continuance of the initial case management conference and all associated deadlines. The initial case management is continued to September 17, 2025 at 1:30 p.m. in Oakland, by videoconference only. All counsel and parties may access the webinar information (public hearings) at <https://cand.uscourts.gov/judges/ryu-donna-m-dmr/>. Parties shall file a joint case management conference statement by September 10, 2025.

IT IS SO ORDERED AS MODIFIED.

DATED: August 13, 2025



HON. DONNA M. RYU
United States Chief Magistrate Judge

¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendant in the above-captioned action.

2. On May 2, 2025, the Court continued the initial case management conference to August 20, 2025, at 1:30 p.m. *See* Dkt. No. 97.

3. I will no longer be handling this case on behalf of Defendant, and it will be reassigned to a new Assistant United States Attorney ("AUSA"). The new AUSA will start with this office on September 2, 2025.

4. I informed Plaintiff of the impending reassignment, and we agreed to request a continuance of the initial case management conference to allow time for Plaintiff to confer with Defendant's new counsel.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: August 12, 2025

s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney